LAW OFFICES

PRUITT, GUSHEE & FLETCHER

SUITE 1850 BENEFICIAL LIFE TOWER

SALT LAKE CITY, UTAH 84111 (801) 531-8446

TELECOPIER (80) 5318468

OF COUNSEL JAMES F. SHEPHERD

ROBERT G. PRUITT, JR OLIVER W GUSHEE, JR F. ALAN FLETCHER ROBERT G. PRUITT, III THOMAS W. BACHTELL A. JOHN DAVIS, III FREDERICK M. MACDONALD

February 4, 1987



Mr. Don Pendleton, Manager Richfield District Office 150 East 900 North Richfield, UT 84701

DIVISION OF OIL, GAS & MINING

Re: H-G Group of Mining Claims

Dear Don:

In accordance with our telephone conversation last week, we have prepared and enclose three (3) copies of Plan of Operations for work upon the H-G Group of unpatented mining claims situated on Sevier Dry Lake, Millard County, Utah for your review and approval.

We believe that the information contained in the Plan of Operations is complete and responsive to the regulations. However, should you find that their is additional information that you require in connection with the review and approval, please call me by telephone or either the following:

Murray Godbe Larry Sower

Salt Lake City Millard

532-2506 387-5542

Obviously, we are anxious to gain the approval as soon as possible to the end that any additional information may be provided as expeditiously as possible.

Very truly yours,

Gushée, Jr.

OWG: is Enclosures

cc: Murray Godbe

Larry Sower

a copy of this letter with 3 eys of enclosure received this date

The following PLAN OF OPERATIONS for the H-G Group of Unpatented Mining Claims is hereby filed pursuant to 43 CFR 3809.1-4.

Area: Sevier Dry Lake, Millard County, Utah

Claim Owner and Operator:

W. D. Haden Company P.O. Box 3006 Houston, TX 77253

Map: Enclosed is Map #U11U-454(a) showing existing routes of access and the area where surface disturbance will occur.

Names of Claims: See attached Exhibit "A".

Scope of Work:

The scope of the work to be accomplished is more thoroughly discussed below, but generally includes the following elements to be commenced by March 15, 1987 and continuing to completion approximately April 30, 1987.

- A). Construction of a containment dike.
- B). Establishing a temporary campsite.
- C). Establishing containment dike construction materials source.
- (1) Description and Purpose of Containment Dike. The containment dike, bearing N20°W, will begin at a point within the W½NW¼ section 15, T24S, R12W, SLM to a point within the E½ NW¼ section 4, T24S, R12W, SLM for a total length of 11,250 feet [refer to attached map U11U-454(a)]. With the possible exception of on/off ramps the containment dike will be situated entirely within the Sevier Dry Lake basin and in no event will the dike encroach outside of the lake meander line (elevation 4523 \pm ft m.s.l.).

The purpose of the containment dike is to separate the main lake basin from the southwest embayment area to protect the embayment from surface water flooding and provide an area large enough to conduct operational studies of mineral bearing brines of Sevier Dry Lake in sequential ponds. Dependent upon brine level and contour bottom elevations within the contained southwest embayment, low separation berms may be required to

control brine depths and facilitate gravity flow through the pond system.

The surface of the lake bed under normally dry conditions is an unvegetated mud flat with existing surface salt deposits. Studies undertaken in the proposed operations represent a controlled extension of the normal process of evaporation which the lake is presently experiencing. No brines or effluents from the diked embayment will be injected into the system (i.e. subsurface). Nothing will be discharged to the Sevier Dry Lake basin which was not derived from the lake basin. No chemical agents will be used in the process contemplated.

As demonstrated by similar facilities on the Great Salt Lake, dike emplacement is a transitory situation if the dikes are not maintained. A continuing dike maintenance program is contemplated with all reasonable measures to be taken to prevent or control on-site and off-sites damage to lands.

Dike Design Details:

Crest Width = 15 feet
Side Slopes = 3:1
Consolidation = 30%
Maximum Height = 5 feet
Average Height = 3.4 feet
Maximum Length = 11,250 feet
Total Fill = 50,000 yards
Top of Dike = 4,523 feet m.s.l.
Area disturbed = less than 10 acres

(2) Temporary Campsite.

The proposed temporary campsite is to be sited within the NW $\frac{1}{4}$ section 15, T24S, R12W, SLM (refer to attached map U11U-454). There will be no permanent construction. The purpose of the campsite is to act as a staging area, service and fueling facility for the dike construction period.

No new access roads will be constructed. The area disturbed will be less than 2 acres.

All refuse and wastes will be containerized and hauled off site to approved county or local waste disposal facilities. The campsite will not be abandoned until a complete clean up has been accomplished in a manner compatible with existing county, state and federal rules and regulations.

(3) <u>Dike Construction</u>. The method of construction will involve use of end dump trucks and dozers to extend the dike across the lake basin. The dike will be built in a series of lifts to allow for expected high initial settlement rates. Excavated material from the materials source will be loaded at

the source and transported by the end dump trucks directly to the dike construction site.

While it is not the intention to abandon the containment dike once constructed, the operator will bond for and comply with reclamation requirements of the Bureau of Land Management and/or the Utah Division of Oil, Gas & Mining rules and regulations.

(4) <u>Dike Construction Materials and Source</u>. The containment dike construction materials source will be a site adjacent to the area within the W½ NW½ section 22, T24S, R12W, SLM [refer to attached map U11U-454(a)]. All lands encompassed by the materials source are public domain of the United States administered by the Bureau of Land Management. An Application for Materials Purchase has been filed with the B.L.M. office in Fillmore, Utah. Operator will comply with all restrictions, reclamation requirements and stipulations to the Materials Purchase Contract issued by the B.L.M.

A sample has been collected from the proposed materials source and subjected to size sieving analyses. Results are as follows:

Size Fraction	Percent of Total
+ 1" + .75" + .50" + .25" + .187" + .0787" + .0165" + .0165"	0 9.17% 5.25% 11.78% (abundant clay, 5.27% aggl.) 8.21% (mostly clay, 8.59% little silt) 51.68% 99.95%

Approximately 50,000 cubic yards of dike fill construction material will be excavated from the materials source barrowpit. No blasting or solid rock quarrying is anticipated. Normal unconsolidated gravel material excavation procedures will be utilized.

Top soil and subsoil are poorly represented in the area. Samples from the material source area show a 60% clay fraction. Where encountered, top soil will be stockpiled and redistributed over the area as recommended. Reseeding will be done with a mixture and at a rate required by appropriate regulations and/or stipulations.

Upon completion of excavation, the materials source barrow pit will be contoured to a slope no greater than a 2 to 1

ratio. No drainage channels will be blocked to allow unrestricted surface water runoff.

No new access roads are contemplated. An existing road beginning at the Black Rock Garrison road accesses the materials source site and is the eastern edge boundary of the site [refer to attached map UllU-454(a)]. Certain places in the existing access road, particularly near the lake edge, may require upgrading by addition of road gravel, blading and compaction.

(5) Reclamation Procedures. At time of abandonment, it is contemplated the dike will be breached to ensure unrestricted drainage and surface water flow. Based upon experience in the Great Salt Lake area, breaching would allow the lake to reclaim fill leaving a smooth undisturbed surface. Dike construction material will be similar in composition to existing Sevier Dry Lake basin bottom sediments containing in excess of 60% clay fraction (reference to sieve analysis item 4). Should breaching and natural settlement not prove satisfactory, then the reclamation plan predicates physically removing dike fill material and distributing it evenly over the lake basin in the immediate area. Such a procedure would be accomplished by use of a back hoe and/or dragline using the top dike crest as an operating platform and reclaiming the material from one terminal end, retreating as work progresses toward the opposite terminal end.

The Sevier Dry Lake basin bottom sediment area, due to its high saline content, does not and will not support any vegetative cover. Outside of the meander line and at elevations above 4,523 ft. m.s.l. peripheral to it, normal desert grasses, rabbit bush, salt tolerant plant species and sage brush all occur sparsely. Operator will comply with all required reclamation determined by the Bureau of Land Management and/or the Utah Division of Oil, Gas & Mining pursuant to appropriate rules and regulations. Operator will comply with applicable environmental protection statutes and regulations.

Operating activities will be conducted by the undersigned as a prudent operator and no surface disturbances greater than would normally result in usual, customary and proficient operations of similar character will occur, and all measures to prevent unnecessary or undue degradation will be undertaken.

W. D. HADEN COMPANY

A: ////

M. C. GODBE, III, Agent